

1 Paul L. Stoller (No. 016773)
2 Ashley Crowell (No. 027286)
DALIMONTE RUEB STOLLER, LLP
3 2425 E. Camelback Road, Suite 500
4 Phoenix, Arizona 85016
5 Tel: 602.888.2807
6 paul@drlawllp.com
7 ashley@drlawllp.com

8 John A. Dalimonte
9 (Admitted Pro Hac Vice, MA Bar No. 554554)
10 **DALIMONTE RUEB STOLLER, LLP**
11 85 Devonshire Street, Suite 1000
12 Boston, MA 02109
13 Telephone: (833) 443-7529
14 Facsimile: (855) 205-2053
15 john@drlawllp.com

16 IN THE UNITED STATES DISTRICT COURT
17 FOR THE DISTRICT OF ARIZONA

18 IN RE BARD IVC FILTERS PRODUCTS
19 LIABILITY LITIGATION

20 This Document Applies to:

21 **KIMBERLEY WATKINS**

22 No. 2:15-MD-02641-PHX-DGC
(AZ Member Case - 2:19-CV-02312)

23 **NOTICE OF VOLUNTARY
DISMISSAL OF C.R. BARD, INC.
WITHOUT PREJUDICE**

24 Pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Plaintiff
25 Kimberley Watkins, gives notice that she dismisses *without prejudice* her complaint as
26 against only Defendant C. R. Bard, Inc. in this civil action. This dismissal does not
27 extend to Plaintiff's claims against Defendant Bard Peripheral Vascular, Inc.

28 Defendant C. R. Bard, Inc. has not filed an answer or motion for summary
judgment; therefore, this Notice is proper under Rule 41(a)(1)(A)(i).

29 DATED this 10th day of September 2019.

30 **DALIMONTE RUEB STOLLER, LLP**

31 By: /s/ Paul L. Stoller

32 John A. Dalimonte
33 Paul L. Stoller
34 Ashley Crowell

35 *Attorneys for Plaintiff*

CERTIFICATE OF SERVICE

I hereby certify that on this day of September 2019 I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Donna M. Berrios